1 2 3 4 5 6 7	Harpreet S. Walia, Esq. (SBN 176136) Lisa M. Chapman, Esq. (SBN 118113) ROYSE LAW FIRM, PC 1717 Embarcadero Road Palo Alto, California 94303 Telephone: (650) 813-9700 Facsimile: (650) 813-9777 E-Mail: hwalia@rroyselaw.com lchapman@rroyselaw.com Attorneys for Counterdefendant SANDEEP SOOI MONSOON ENTERPRISES, INC., a California of	corporation
8	UNITED STATES DISTRICT COURT	
-	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO DIVISION	
11 12	NEXTDOOR.COM, INC., a Delaware	Case No.: 3:12-cv-05667-EMC
13	corporation,	
14	Plaintiff,	DECLARATION OF HARPREET S. WALIA
15	V.	IN SUPPORT OF COUNTERDEFENDANTS SANDEEP SOOD AND MONSOON
16	RAJ ABHYANKER, an individual,	ENTERPRISES, INC'S REQUEST FOR JUDICIAL NOTICE
17	Defendant.	JUDICIAL NOTICE
18	RAJ ABHYANKER, an individual,	
19	Counterclaimant,	Complaint Filed: November 5, 2012
20	v.	Counterclaim Filed: January 10, 2013 First Amended Counterclaim Filed: April 8, 2013
21	NEXTDOOR.COM, INC., a Delaware	•
22	corporation; PRAKASH JANAKIRAMAN, an individual; BENCHMARK CAPITAL	
23	PARTNERS, L.P., a Delaware limited partnership; BENCHMARK CAPITAL	Date: June 6, 2013 Time: 1:30 PM
24	MANAGEMENT CO. LLC, a Delaware limited	Judge: Honorable Edward M. Chen Place: Courtroom 5 - 17th Floor
25	liability company; SANDEEP SOOD, an individual; MONSOON ENTERPRISES, INC., a	450 Golden Gate Avenue
26	California corporation, and DOES 1-50, inclusive,	San Francisco, California 94102
27	Counterdefendants.	
28		

I, HARPREET S. WALIA, do hereby declare as follows:

- 1. I am an attorney at law and a member of the Royse Law Firm, PC, which represents Counterdefendants Sandeep Sood ("Sood") and Monsoon Enterprises, Inc., a California corporation ("Monsoon") before the Court in this action. I am licensed to practice law in the State of California and admitted before this Court. I have personal knowledge of each of the facts set forth herein, and would competently testify to the truth thereof if called as a witness.
- 2. Attached to Counterdefendants' Request for Judicial Notice as **Exhibit 1** is a true and correct copy of Counterclaimant Raj Abhyanker's Complaint for Damages and Equitable Relief for Intentional Interference with Existing and Prospective Economic Advantage, Breach of Confidence, Breach of Contract, Fraud and Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting Constructive Fraud, Unjust Enrichment, Unfair Business Acts and Practices in Violation of Business and Professions Code (Cal.Civ.Code § 17200, *et seq.*), Violations of the California Corporate Securities Laws, and Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, *et seq.*), filed on November 10, 2011 in the Superior Court of California, County of Santa Clara, as Civil Case No. 1-10-CV-212924.
- 3. Attached to Counterdefendants' Request for Judicial Notice as **Exhibit 2** is a true and correct copy of Counterclaimant Raj Abhyanker's First Amended Complaint for and Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, *et seq.*), Fraud and Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting Constructive Fraud, Negligent Interference with Existing and Prospective Economic Advantage, Breach of Confidence, Breach of Contract, Breach of Implied Covenant of Good Faith and Fair Dealing, Negligent Misrepresentation, Tortious Interference with Contract, Unjust Enrichment, Unfair Business Acts and Practices in Violation of Business and Professions Code (Cal.Civ.Code § 17200, *et seq.*), Violations of the California Corporate Securities Laws, and Conversion, filed on December 6, 2011 in the Superior Court of California, County of Santa Clara, as Civil Case No. 1-11-CV-212924.
- 4. Attached to Counterdefendants' Request for Judicial Notice as **Exhibit 3** is a true and correct copy of Counterclaimant Raj Abhyanker's November 22, 2006 patent application no. 11/603,442; Publication Date September 20, 2007, entitled "Map Based Neighborhood Search and Community Contribution."

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration is executed this 25th day of April, 2013 at Palo Alto, California. /s/ Harpreet S. Walia HARPREET S. WALIA

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